

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**CITY OF DETROIT'S COUNTER-DESIGNATION OF THE CONTENTS OF THE
RECORD ON APPEAL OF THE ORDER GRANTING CITY OF DETROIT'S MOTION
FOR THE ENTRY OF AN ORDER (I) ENFORCING THE PLAN OF ADJUSTMENT
INJUNCTION AND (II) REQUIRING B&C LAND DEVELOPMENT CORPORATION
TO (A) DISMISS WITH PREJUDICE ITS STATE COURT LAWSUIT AND (B)
WITHDRAW ITS NOTICE OF LIS PENDENS**

Pursuant to Rule 8009(a)(2) of the Federal Rules of Bankruptcy Procedure, Appellee, City of Detroit, Michigan ("City") submits this counter-designation of the contents of the record on appeal of the Order Granting City of Detroit's Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring B&C Land Development Corporation to (A) Dismiss With Prejudice Its State Court Lawsuit and (B) Withdraw Its Notice of Lis Pendens:

Docket Number in Bankruptcy Case No. 13-53846	Description
1146	Motion of Debtor, Pursuant to Sections 105, 501 and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), for Entry of an Order Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof
1782	Order, Pursuant to Sections 105, 501 and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof
8045	Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014)
8272	Order Confirming Eighth Amended Plan for the Adjustment of Debts of the City of Detroit
10087	City of Detroit's Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring B&C Land Development Corporation to (A) Dismiss With Prejudice Its State

	Court Lawsuit and (B) Withdraw Its Notice of Lis Pendens
10088	City of Detroit's Ex Parte Motion for an Order Shortening Notice and Scheduling an Expedited Hearing on the Motion for the Entry of and Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring B&C Land Development Corporation to (A) Dismiss With Prejudice Its State Court Lawsuit and (B) Withdraw Its Notice of Lis Pendens
10091	Order Granting City of Detroit's Ex Parte Motion for an Order Shortening Notice and Scheduling an Expedited Hearing on the Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring B&C Land Development Corporation to (A) Dismiss With Prejudice Its State Court Lawsuits and (B) Withdraw Its Notice of Lis Pendens
10107	B&C Land Development Corporation's Response to City of Detroit's Motion for Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring B&C Land Development to (A) Dismiss with Prejudice Its State Court Lawsuit and (B) Withdraw its Notice of Lis Pendens
10115	Reply of the City of Detroit in Support of Its Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring B&C Land Development Corporation to (A) Dismiss With Prejudice Its State Court Lawsuit and (B) Withdraw Its Notice of Lis Pendens
10119	Order Granting City of Detroit's Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring B&C Land Development Corporation to (A) Dismiss With Prejudice Its State Court Lawsuit and (B) Withdraw Its Notice of Lis Pendens
10126	Transcript Regarding Hearing Held on August 5, 2015
10139	Notice of Appeal and Statement of Election by B & C Land Development Corporation
10141	Notice of Deficient Filing: Bankruptcy Matter Civil Case Cover Sheet Missing
10142	Notice of Requirement to File Designation
10143	Notice of Transmittal of Notice of Appeal
10144	THIS PLEADING HAS BEEN STRICKEN PER ORDER OF THE COURT DATED 08/21/2015. Bankruptcy Matter Civil Cover Sheet Filed by (RE: related document(s)10139 Notice of Appeal). (Cotton, Horace) Modified on 8/21/2015 (lmoss). (Entered: 08/20/2015)
10149	Notice of Receipt of Bankruptcy Appeal
10152	Order of the Court to Strike: This document is stricken from the record because the incorrect District Court Bankruptcy Matter Civil Cover Sheet has been filed. The correct form can be found on this Court's website, under Local Forms. (related document 10144 Bankruptcy Matter Civil Cover Sheet). So Ordered by /s/ Judge Thomas J. Tucker.(RE: related document 10144 Bankruptcy Matter Civil Cover Sheet filed by Respondent B&C Land Development Corporation)

(sikula, christine)

This Notice of Electronic Filing is the Official ORDER for this entry. No ORDER is attached.

September 16, 2015

Respectfully submitted,

By: /s/ Marc N. Swanson

Jonathan S. Green (P33140)

Marc N. Swanson (P71149)

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Telephone: (313) 496-7591

Facsimile: (313) 496-8451

green@millercanfield.com

swansonm@millercanfield.com

ATTORNEYS FOR THE CITY OF DETROIT